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Illinois Department of Natural Resources

524 South Second Street, Springfield, Illinois 62707-1787

George H. Ryan, Governor • Brent Manning, Director

<http://dnr.state.il.us>

March 12, 2001

Mr. John P. Kos, P.E.
Illinois Dept. Of Transportation
201 West Center Court
Schaumburg, Illinois 60196

RE: FAP 340
I-355 South Extension
Draft Supplemental Final EIS
Cook, DuPage and Will Co.
Proj. Code: 100038

Dear Mr. Kos:

The Illinois Department of Natural Resources has reviewed the Draft Supplemental Final Environmental Impact Statement and Section 4(f) Evaluation for F.A.P. 340 from Interstate Route 55 to Interstate Route 80. We offer the following comments for your consideration.

Threatened and Endangered Species

The IDNR database was reviewed to update this project for possible new occurrences of threatened and endangered species. The update resulted in no new species identified that would require further evaluation within the recommended alignment (Tollroad/Freeway Alternative). It is noted that the Illinois Natural History Survey did a field review in 1998 for T&E species and associated habitat. It is recommended that the INHS again resurvey the corridor for listed species population and habitat at a three year interval as this project may continue to experience delays.

Wetlands

The project was reviewed by the Wetlands Program Manager of IDNR for compliance with the Interagency Wetlands Policy Act of 1989. Those comments were sent directly to the Wetlands Unit Manager for the Illinois Department of Transportation in Springfield. A copy of those comments is attached for reference.

If you have any questions on the above, please contact me at 217-785-5500.

Sincerely,

Steve Hamer
Transportation Review Program
Division of Natural Resource Review and Coordination

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George H. Ryan, Governor • Joe Hampton, Director

Office of the Director

State Fairgrounds • P.O. Box 19281 • Springfield, IL 62794-9281 • 217/782-2172 • TDD 217/524-6858 • Fax 217/785-4505

January 16, 2001

Mr. John P. Kos, P.E.
District Engineer
Illinois Department of Transportation, District 1
210 West Center Court
Schaumburg, IL 60196

Re: Draft Supplemental Final Environmental
Impact Statement and 4(f) Evaluation
FAP Route 340 (I-355 South Extension)
I-55 to I-80
Cook, DuPage, and Will Counties

Attn: Patrick J. Pechnick, P.E.

Dear Mr. Kos:

The Illinois Department of Agriculture (IDA) has reviewed the Draft Supplemental Final Environmental Impact Statement and 4(f) Evaluation prepared for the extension of I-355 between I-55 and I-80 in Will County, Illinois. We submit the following comments.

In 1995 and 1996, the IDA reviewed the Draft and Final Environmental Impact Statements (EISs) that were prepared for this project. We determined that IDOT's preferred alternative was consistent with intent of the state's Farmland Preservation Act (505 ILCS 75/1 et seq.). The Draft Supplemental Final EIS states that the project's agricultural impacts have not changed since the Draft and Final EISs were prepared. Therefore, the IDA continues to find the project in compliance with the intent of the state's Farmland Preservation Act.

Sincerely,

JH:JRH

cc: Governor George Ryan
Joan Messina, IDA
Mike Williams, IDA
John Cross, IDA
John Herath, IDA
Warren Goetsch, IDA
Steven Frank, IDA
Senator James Phillip
Senator Emil Jones

Representative Michael Madigan
Representative Lee Daniels
Senator William F. Mahar
Senator Edward Petka
Representative Brent Hassert
Representative Renee Kosel
Interagency Committee
John Rowley, IDOT
Gerald Luedtke, Will-S. Cook Co. SWCD

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Illinois Environmental Council

319 W. Cook Springfield, IL 62704
Phone: 217-544-5954; Fax 217-544-5958; Internet: www.ilenviro.org

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Director of Administration

John Thompson
Power Plant Clean-up Project

February 28, 2001

Mr. John P. Kos, P.E.
District Engineer
Illinois Department of Transportation
201 W. Center Court
Schaumburg, Illinois 60196

Re: I-355 South Draft SEIS

Dear Mr. Kos:

The Illinois Environmental Council is writing to object to the inadequate consideration of reasonable alternatives in the I-355 South Draft Supplemental Environmental Impact Statement (SEIS), including the lack of assessment of the environmental consequences of any of the alternatives.

3.6 Alternative analysis is the heart of an Environmental Impact Statement. The National Environmental Policy Act (NEPA) requires consideration of all reasonable alternatives to a proposed project. It is especially critical that IDOT and the Toll Highway Authority consider reasonable alternatives at this time, for both have acknowledged there is no funding or a funding plan for building a tollway.

3.7 The SEIS does not illuminate the advantages and disadvantages of various alternatives. Rather it is a pro-forma document, which was conducted not to promote full consideration of reasonable alternatives, but to provide a superficial rationale for a decision to build a tollway.

One alternative which should be included in the SEIS is the alternative that would combine substantial local arterial roadway improvements with transit and TDM measures. Your office received detailed information July 26, 2000, regarding this alternative in the Action Plan.

The Action Plan addresses both regional and local travel, provides information regarding the benefits for local and regional travel. The roadway improvements in the Action Plan have triple the capacity of the proposed tollway. Further the Action Plan's projects are drawn directly from the official Will County Long-range plan, the RTP, the TIP, and IDOT's own five year plan. These substantial projects include a four-lane bridge across the Des Plaines River at Bruce Road, major arterial expansions, major upgrades to the Metra Southwest line etc.

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For no apparent reason, this alternative proposal was ignored entirely in the SEIS. Instead IDOT selected alternatives, such as "transit-only" which can only be characterized as a sham position.

The omission of the Action Plan violates NEPA's requirement that "all reasonable alternatives" be considered in detail. In addition NEPA requires that the impacts of various alternatives be compared to one another, so that the public and decision makers can evaluate the pros and cons of one alternative versus another. The SEIS fails to give any comparative analysis, and only provides information - and not that much - about the impacts of the tollway project. The Illinois Environmental Council is most concerned that the SEIS does not contain any calculation of the differences in air quality among the various alternatives.

The Illinois Environmental Council is also very concerned about the lack of active public involvement in the development of the SEIS, including chances for public input at all critical stages before a draft is published. As a state-wide coalition of environmental organizations and individual members, we have many members and affiliate organizations who have found it very difficult to participate in the development of the SEIS.

IDOT refused, on a timely basis, to share its statement of Purpose and Need, which is supposed to be the basis for its alternative analysis.

The draft SEIS was not available to the public until a few weeks after IDOT and FHWA published their Federal Register notice that the public comment period was open.

IDOT did not invite public input regarding the Purpose and Need statement and the selection of alternatives for consideration. On the few occasions when IDOT addressed the public, it announced that the agency had already selected and analyzed its alternatives and had concluded that the tollway was the superior alternative.

Many members of the public who do not have access to a computer with CD-ROM were unable to get a copy of the written document.

The Illinois Environmental Council requests that the SEIS be redrafted to respond to these significant concerns. Thank you.

Sincerely,

Eleanor K. Roemer
President